

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

WILLIAM PARKER,

Plaintiff,

v.

EDWARD C. GAINEY, et al.,

Defendants.

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No. 2:23-cv-2102

JURY TRIAL DEMANDED

CERTIFICATE OF CONFERRAL

Undersigned counsel for Defendant Michael Gay certifies that she has made good-faith efforts to confer with Mr. Parker to determine whether the identified pleading deficiencies may be cured by amendment. All efforts to confer have been via e-mail, as Mr. Parker refuses to speak to undersigned counsel via telephone.

Undersigned counsel e-mailed Mr. Parker a letter on April 24, 2024, outlining the deficiencies in his Complaint with respect to Mayor Ed Gainey, Chief Larry Sciroto, Detective Michael Gay, and Detective Kerry Ford. On May 7, 2024, Mr. Parker indicated he intended to amend his Complaint. Undersigned counsel asked Mr. Parker when he planned to amend his Complaint, and Mr. Parker has not yet responded. To date, Mr. Parker has not amended his Complaint, necessitating the filing of this motion in order to adhere to the deadline for responding to Mr. Parker's Complaint on behalf of Detective Gay.

It should also be noted that Mr. Parker indicated as early as January 2, 2024, that he planned on amending his Complaint. *See* ECF No. 11-1. Since then, Mr. Parker has failed to amend his Complaint and has failed to respond to two motions to dismiss filed by the City of Pittsburgh and Bethany Hallam at ECF Nos. 11 and 17, respectively.

Respectfully submitted,

KRYSIA KUBIAK
City Solicitor

/s/ Hillary M. Weaver

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